

REMARKS

Applicant thanks the Examiner for conducting a personal interview with Applicant's representative at the USPTO on March 24, 2004. At the interview, the rejections of pending independent claims 1, 8 and 13 were discussed, including a review of the disclosure of *Hirzmann* (US 6,535,394 B1). After further review, the Examiner indicated that claims 8-12 are allowable over *Hirzmann*. Applicant thanks the Examiner for this indication. However, the Examiner maintained the rejection of claims 1 and 13 in view of *Hirzmann*. Applicant continues to disagree with this rejection.

Status of the Application

Claims 1-35 are all the claims pending in the Application, as claims 31-35 are hereby added. Only claims 1-7, 13 and 28-30 are rejected.

Claims 28-30 are amended to correct obvious typographical errors. These amendments are non-limiting.

Allowable Subject Matter

Applicant thanks the Examiner for indicating after the above-noted personal interview that claims 8-12 are allowed.

Applicant thanks the Examiner for indicating, in the February 10, 2004 Office Action, that claims 20-27 are allowed, and that claims 14-19 would be allowed if rewritten in independent form. Applicant respectfully requests that the Examiner hold in abeyance any rewriting of claims 14-19 until the Examiner has had an opportunity to reconsider (and withdraw) the prior art rejection of their base claims.

Claim Rejections

The Examiner has rejected claims 1-6, 13 and 28-30 under 35 U.S.C. § 102(e) as being anticipated by *Hirzmann* (US 6,535,394 B1; hereinafter “*Hirzmann*”), and claims 7 and 12 under 35 U.S.C. § 103(a) as being unpatentable over *Hirzmann*. These rejections are respectfully traversed.

Applicant respectfully submits that *Hirzmann* fails to teach or suggest that the ground connecting member “extends from said substrate toward said compensating member” and “directly resiliently contacts said compensating member,” as recited in claims 1 and 13.

An exemplary embodiment of this recited relationship is shown in FIG. 2 of the Application, which is reproduced below in inverted form with element numbers added for clarity. In the exemplary embodiment, ground connecting member 1 “extends from” substrate 2 “toward” compensating member 4 and “directly resiliently contacts” compensating member 4. The direct resilient contact is provided by the triangularly shaped metal spacer.

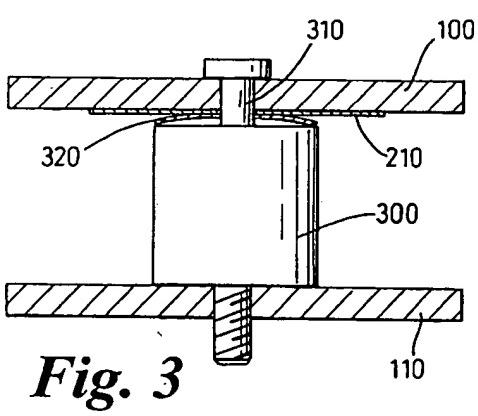


Fig. 3 Of Hirzmann

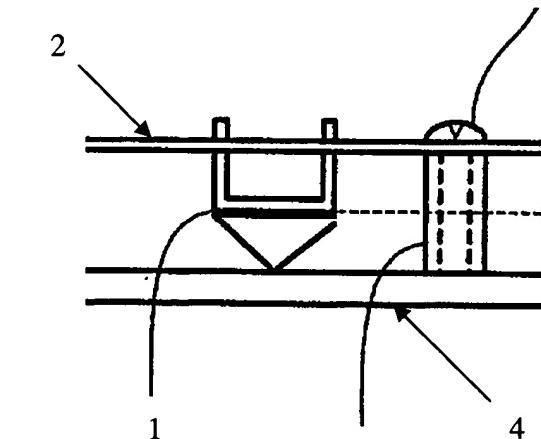


Fig. 2 Of The Instant Application

The Examiner alleges that *Hirzmann* discloses, in FIG. 3 (reproduced above) “a ground connecting member (300, 320, 310) ... [that] extends from the substrate (100) toward the

compensating member (110) directly (contacts by engaging surfaces of 300 and 110) resiliently contacts (by the spring 320) the compensating member (110)."

Thus, the portion of *Hirzmann* which the Examiner alleges to: (1) have some correspondence to the recited "ground connecting member" is a combination of fixing post 300, slot 310 and split washer 320; and (2) have some correspondence to the recited "compensating member" is casing 110.

Accordingly, to disclose the features recited in claim 1, *Hirzmann* must disclose, teach or suggest that the combination of fixing post 300, slot 310 and split washer 320 "extends towards" casing 110, and "directly resiliently contacts" casing 110.

However, as can be clearly seen in FIG. 3 of *Hirzmann*, the combination of fixing post 300, slot 310 and split washer 320 is fixed to casing 110 by a screw, not by any resilient contact.

In fact, the only portion of *Hirzmann* that could be interpreted to provide any kind of resilient contact, split washer 320, is arranged within the combination of fixing post 300, slot 310 and split washer 320 alleged by the Examiner to correspond to the recited "ground connecting member." However, split washer 320 does not contact any portion of casing 110, and thus cannot provide a direct resilient contact against casing 110.

Thus, Applicant respectfully submits that rejected independent claims 1 and 13 are patentable over the applied reference. Further, Applicant respectfully submits that rejected dependent claims 2-7 and 28-30 are allowable, *at least* by virtue of their dependency.

Thus, Applicant respectfully requests that the Examiner withdraw these rejections.

New Claims

Claims 31-35 are hereby added. Independent claims 31 and 32 are similar to independent claims 1 and 13, but recite the features of the invention in a different manner. Claims 33-35 are dependent upon claims 1 or 13, and are supported *at least* by FIGS. 2 and 3 of the instant Application.

Conclusion

In view of the foregoing, it is respectfully submitted that claims 1-35 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-35.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Please charge any fees which may be required to maintain the pendency of this application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,



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